

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

DECLARATION OF RENEE TOWNSEND

I, Renee Townsend, hereby declare:

1. I am employed by Planned Parenthood of Greater Texas, Inc. ("PPGT"). My official title is Health Services & Operations Support Coordinator. In this role, I am responsible for data analysis and reporting.
2. I am not a president, vice president, officer, or managing or general agent of PPGT, and I have never been authorized to perform the chief executive function of the organization.

3. I am not an agent authorized to accept service on PPGT's behalf.
4. On Thursday, January 13, 2022, I returned to the PPGT office following my lunch break, and I observed that a copy of the Complaints filed by the Relator and the State of Texas and Summons from this case ("Complaints and Summons") had been left outside the doors to the office. Later that afternoon, at or around 4:30 pm, I brought the Complaints and Summons inside to PPGT's office.
5. On January 17, 2022, a process server returned to the PPGT office with the Complaints and Summons. I told the process server that I did not have the authority to accept the documents. The process server recorded my name by checking my identification badge and confirmed my position at PPGT. I then took the documents from the process server.
6. On Monday, January 31, 2022, I checked the mail at PPGT's office, and I saw that a package containing the Complaints and Summons had arrived to the office over the weekend. The documents were sent by Austin Process, Inc. Although the mail arrived with a certified return receipt, the green signature slip was missing from the envelope. Ordinarily, I would be the person at PPGT who signs for certified mail. Although there are typically between 15 and 20 employees in the building on weekdays, I do not know of anyone who regularly works in the office during the weekend. My understanding, therefore, is that nobody from PPGT could have signed for the documents, as they arrived over the weekend, when our office is closed.

I declare under penalty of perjury under the laws of Texas that the foregoing is true and correct.

DATED: February 11, 2022

By: Renee' Townsend
Name: Renee Townsend
Title: Health Services & Operations
Support Coordinator, Planned
Parenthood of Greater Texas, Inc.